

FORM TO BE USED BY A PRISONER IN FILING A  
CIVIL RIGHTS COMPLAINT

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Lauren HATLEY  
(Enter above the full name of the plaintiff in this action)

COMPLAINT

v.

Civil Action No. \_\_\_\_\_  
(To be supplied by the Clerk of the Court)

EDNA MATTAN Correctional  
Facility Administrator SARA DAVIS,  
Administrative Ms Heller, Administrator  
ST Paul and all CEO's Chief Executives

(Enter above the full name of the defendant or defendants  
in this action)

RECEIVED

SEP 03 2020

AT 8:30  
WILLIAM T. WALSH  
CLERK

INSTRUCTIONS -- READ CAREFULLY

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$350.00, your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

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6. If you cannot prepay the \$350.00 filing fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth below. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

The Prison Litigation Reform Act of 1996 ("PLRA"), effective April 26, 1996, has made significant changes to the in forma pauperis statute, 28 U.S.C. § 1915. The statute no longer provides for waiver of court filing fees for prisoners who are granted leave to proceed in forma pauperis. A prisoner who is granted leave to proceed in forma pauperis is not required to pay the filing fees in advance, but the prisoner is obligated to pay the entire filing fee in installment payments regardless of the outcome of the proceeding. This obligation to pay the filing fee continues even if the prisoner is transferred to another prison. Therefore, before submitting this application to the Clerk of the Court, a prisoner should consider carefully whether he or she wishes to go forward with the action.

The PLRA obligates prisoners who are granted in forma pauperis status to pay the entire filing fee in the following manner, regardless of the outcome of the litigation. 28 U.S.C. § 1915(b)(1) and (2). The agency having custody over the prisoner shall deduct from the prisoner's institutional account and forward to the Clerk of the Court (1) an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prisoner's account or the average monthly balance in the prisoner's account for the six-month period immediately preceding the filing of the complaint, and (2) payments equal to 20% of the preceding month's income credited to the prisoner's institutional account each month the amount in the account exceeds \$10.00, until the \$350.00 filing fee is paid. 28 U.S.C. § 1915(b)(1) and (2). However, a prisoner who has no assets and no means by which to pay the initial partial filing fee will not be prohibited from bringing a civil action. 28 U.S.C. § 1915(b)(4).

Each prisoner plaintiff who desires to proceed in forma pauperis must submit the following to the Clerk of the Court:

- a. a completed, signed, and dated application to proceed in forma pauperis (attached hereto); and
  - b. a certified copy of your prison account statement for the 6-month period immediately preceding submission of this application, listing the account balance and all deposits into the account. A prison account statement must be obtained from the appropriate official of each prison at which you are or were confined during the preceding 6 months.
7. If your application to proceed in forma pauperis does not conform to these instructions, you will be notified by letter of the nature of the deficiencies. If these deficiencies are not cured within 120 days of the date of the letter, the complaint will be deemed withdrawn, the Clerk's file will be closed, and no fees will be assessed against you.
8. If you are given permission to proceed in forma pauperis, the Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States

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Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. § 1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics,  
403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

- a. Parties to previous lawsuit:

Plaintiff(s): Lauren Whitley

Defendant(s): EDNA Mahan Correctional Facility, Administrator Sara Davis,  
Administrator Ms. Keller, Administrator Mr. ST Paul and all CEOs or chief executive

- b. Court and docket number: \_\_\_\_\_

- c. Grounds for dismissal: ( ) frivolous ( ) malicious ( ) failure to state a claim upon  
which relief may be granted



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- d. Approximate date of filing lawsuit: 8-08-2020
- e. Approximate date of disposition: 8-18-2020

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? Edna Mahan Correctional Facility

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

- a. Name of plaintiff: Lauren Whalley
- Address: P.O. Box 4004 Clinton, MS 08809

Inmate #: 666520E

- b. First defendant -- name: Edna Mahan Correctional Facility Sara Davis
- Official position: Lead Administrator
- Place of employment: Edna Mahan Correctional Facility

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Fraud Misrepresentation, gross Negligence, Tampering with evidence  
Tampering with Legal mail, Mental & Emotional distress, Pain & suffering,  
Cruel & Unusual Punishment, Hippa Violation and Defamation &  
Slander, Due Process 14<sup>th</sup> Amendment

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c. Second defendant -- name: Ms Kellie

Official position: 2<sup>nd</sup> Administrator

Place of employment: EDNA MATTAN Correctional Facility

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

Fraud Misrepresentation, gross Negligence, Tampering with evidence,  
Tampering with Legal mail, Mental & emotional distress, Pain & suffering  
CRUEL & UNUSUAL Punishment, Hippa violation, Defamation & Slander  
DUE PROCESS 14<sup>th</sup> ADAMENDMENT

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☒ Yes ☐ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

I CONTINUED TO TAKE PROPER STEPS BY FILING GRIEVANCES  
TO ADMINISTRATION AND SPECIAL INVESTIGATING DIVISION IN REGARDS TO  
SEVERAL ASSAULTS DONE TO ME BY INMATES, ADMIN HAS NEVER ADDRESSED  
THE SITUATION! THAT CAUSED ME TO HARM MYSELF AFTER NUMEROUS CRIS FOR  
HELP AND IN THE EVENT OF SELF HARM I WAS ASSAULTED BY STAFF.  
If your answer is "No," briefly explain why administrative remedies were not exhausted.

S. Defendant Name / Mr. ST Paul  
Official Position / 3rd Administrator  
Place of employment / Eona Mattan Correctional Facility

How is this Person involved in the case What  
are you Alleging this Person did or did not do  
that violated your Constitutional Rights:

Fraud Misrepresentation, Gross Negligence, Tampering with  
Evidence, Tampering with Legal mail, Mental & Emotional distress,  
Pain & Suffering, Cruel & unusual Punishment, Hippa Violation,  
Defamation, slander, Due Process 14<sup>th</sup> Amendment.

Note: that I was Refused to be sent out to  
Hospital for Rape Kit. Once Primary Doctor  
was aware of my condition I WAS sent out  
5 days after my Sexual Assault, Administration instructed  
SID to then instruct the Clinical Personnel  
at "Henderson Medical Center" to Not collect  
Evidence regarding my Sexual Assault AND to  
Not Perform a Rape Kit, and to Not Take  
Pictures of the Bruises that were visible.  
I'm to be Discharged to Detainer in P.A.

"Please send further mail to Parole & Probation

1101 S. Front Street Harrisburg, PA, 17104, if you cannot mail it to  
P.O. Box 4004, Clinton, NJ 08809 "Before I leave Sept 13, 2020"



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6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

ON July 9<sup>th</sup>, 2020 I Reported being sexually assaulted I was Refused  
the Right to Have a Rape Examination Kit By SARAH DAVIS and Fellow  
ADMINISTRATOR'S Mrs. Keller, and Mr. ST Paul. Because of this I Had  
a incident of self Harm this same day around 3:00<sup>PM</sup> I asked to place a  
call to my Private Attorney and was denied my Right to Counsel  
which violated my 14<sup>th</sup> Amendment Right TO due Process. During several  
other attempts to Harm myself I was drugg outside Naked in the  
Rain IN Front of civilians AND male officers exposing my Breast & genital  
Area. I Had male sgt's all over my Naked body & also MALE officers,  
I was subjected to excessive Force By the sgt's & officers, once  
Administrators SARAH DAVIS & Above ADMINISTRATORS Leaved what else Happened  
They gave me disciplinary charges keeping <sup>ME</sup> secluded in a cell 24/Hrs a day  
Without receiving daily fresh air exercise. Admin Refuses TO send  
my Legal mail out, and give me my incoming legal. They Have Refused  
to let me have my Court order Phone calls w/ my children, ADMINISTRATORS  
Have gave the SGT's that engage with daily the impression to  
treat me poorly and By telling them things that are  
not true. AS I'm a Thug, I'm Assaultive & aggressive  
WHICH HAS HARMED my REPUTATION. These things are done to  
Deflect off the Abuse I SUFFERED FROM, THAT ADMIN Refuses  
to let me speak

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7. Relief

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

I call For These Administrators TO Resign, There Needs TO Be proper probcald procednres TO Handle inmates especially Female inmates, inmates that are mental Health. I seek Punitive Damages AS well FOR my Personal injuries AND Also correction staff should Have to wear Body Camera at all times, AND NO male officer should be Allowed TO Deal w/ Female inmates when A event Requires The inmate Being Nude.

8. Do you request a jury or non-jury trial? (Check only one)

(☒) Jury Trial

(☐) Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18<sup>th</sup> day of August, 2020.

  
Signature of plaintiff<sup>1</sup>

<sup>1</sup> EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT.



Lauren Whalley  
P.O. Box 4004  
Clinton, NJ 08811

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS FOLD AT DOTTED LINE

CERTIFIED MAIL



78159 1140 0000 6829 4799

1 cor



United States District Court  
For the District of New Jersey  
402 E State ST  
Trenton, NJ 08608

08608\$1507 C034

